

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO  
LAS CRUCES DIVISION

JUAN CARLOS LEON-HERRERA

*Plaintiff*

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v.

CIVIL ACTION NO. 2:24-CV-00153

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BAR-S FOODS CO D/B/A SIGMA FOODS

AND JORGE ZUNIGA ISAIIS D/B/A RVJ

TRANSPORT

*Defendants*

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UNSWORN DECLARATION OF BRIANNA SOMOHANO

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- 1) My name is Brianna Somohano and my date of birth is April 18, 1995. My address is 6925 Willow Oak, San Antonio, Texas 78249.
- 2) I am employed as a paralegal for attorneys Jason DeSouza and Jorge L. Alvarez, counsel for Juan Carlos Leon-Herrera in the above-referenced lawsuit.
- 3) On the 20<sup>th</sup> of September, 2024 our law firm received the documents identified below via email from counsel for defendant, Jorge Zuniga Isais d/b/a RVJ Transport.
  - *Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Interrogatories to Plaintiff Juan Carlos Leon-Herrera*
  - *Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Requests for Production of Documents to Plaintiff Juan Carlos Leon-Herrera*
  - *Defendant Jorge Zuniga Isais d/b/a RVJ Transport's First Requests for Admission to Plaintiff Juan Carlos Leon-Herrera*
  - *Certificate of Service*
- 4) The above referenced documents received on September 20<sup>th</sup> were served upon attorney Jason DeSouza, attorney Jorge Alvarez, discovery paralegal Jessica Price and myself.
- 5) I forwarded the documents to paralegal Alina Guzman on September 30, 2024, for calendaring on our firm calendaring software.
- 6) On the 22<sup>nd</sup> of October 2024, counsel for Plaintiff served Plaintiff's

Responses and/or Objections to Defendant's Request for Admissions.

- 7) On the 24<sup>th</sup> of October 2024, counsel for plaintiff served the documents identified below via email.
  - *Plaintiff's Answers and/or Objections to Defendant's First Set of Interrogatories*
  - *Plaintiff's Responses and/or Objections to Defendant's Request for Production*
- 8) I declare under penalty of perjury that the foregoing information in this document is true and correct.

EXECUTED on 10/24/24 in San Antonio, Bexar County, Texas.

BY:   
BRIANNA SOMOHANO